UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TEXTBROKER INTERNATIONAL, LLC

Plaintiff(s),

19-cv-05608 (PKC)

Against

CHLOE SKUPNICK, DAVID THELIN, NICOLE THELIN, and JOHN DOES 1-4,

Defendant(s).

NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the plaintiff Textbroker International, LLC and or their counsel(s), give notice that in consideration of a negotiated settlement executed by them, the above captioned action is voluntarily dismissed with prejudice against the defendants David Thelin and Nicole Thelin, with each party to bear its own attorney's fees and costs.

Defendants David Thelin and Nicole Thelin have not served an answer or motion to dismiss and agree to the dismissal. This case is not a class action under Fed. R. Civ. P. 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2. A receiver has not been appointed here. Plaintiff has not dismissed any federal or state court suit based on or including the same claims as those presented here.

Dated: New York, New York September 16, 2019 SOLOMON & CRAMER LLP

By:/s/Andrew T. Solomon Andrew T. Solomon, Esq. 1441 Broadway, Suite 6026 New York, NY 10018 (212) 884-9102

Attorneys for Plaintiff